

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' MOTION TO EXCLUDE THE GENERAL OPINIONS
OF DEFENSE EXPERT CHARLES HANES, M.D.**

Plaintiffs respectfully request that the Court preclude defense expert Charles Hanes, M.D., from giving opinions on (1) the design and safety of the devices he opines on; (2) his personal complication and satisfaction rates with the devices he opines on; and (3) the adequacy of Defendants' product warnings and instructions for use. The basis for Plaintiffs' motion is more fully set out in the accompanying Memorandum.

Dated: August 15, 2019

/s/ Jeffrey M. Kuntz

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on August 15, 2019, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/ Jeffrey M. Kuntz _____
Attorney for Plaintiffs

INDEX OF EXHIBITS

Exhibit A: List of cases on which Dr. Hanes is designated

Exhibit B: Hanes Prolift/Prolift + M Expert Report

Exhibit C: Hanes TVT R, TVT O, TVT A, TVT E Report

Exhibit D: Hanes Deposition, July 12, 2019